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14 *Attorneys for Plaintiff*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 DONNA CARLSON, an individual;  
18 Plaintiff,

19 vs.  
20 SAM'S WEST, INC., a Foreign Corporation  
21 doing business as SAM'S CLUB, and also doing  
22 business as SAM'S CLUB #6382; SAM'S REAL  
23 ESTATE BUSINESS TRUST; DOES I through  
24 X; and ROE CORPORATIONS I through X,  
25 inclusive,

26 Defendants.

27 Case No.: 2:17-cv-02882-MMD-GWF

28  
**STIPULATION AND PROPOSED ORDER**  
**TO EXTEND TIME TO OPPOSE**  
**DEFENDANT'S MOTION FOR**  
**PROTECTIVE ORDER PRECLUDING**  
**INAPPROPRIATE AREAS OF**  
**FED.R.CIV.P. 30(B)(6) EXAMINATION**

**FIRST REQUEST**

29 Plaintiff DONNA CARLSON ("Plaintiff") and Defendants SAM'S WEST, INC. and  
30 SAM'S REAL ESTATE BUSINESS TRUST ("Defendants") by and through their respective  
31 counsel of record, do hereby stipulate to extend the time for Plaintiff to oppose Defendants'  
32 Motion for Protective Order Precluding Inappropriate Areas of FRCP 30(b)(6) Examination, by  
33 fourteen (14) days.

1 Pursuant to Local Rule 2.25, the parties hereby aver that this is the first request for such  
2 extension of time regarding Plaintiff's opposition to this motion.  
3

4 The parties aver, pursuant to Local Rule 2.25, that good cause exists for the requested  
5 extension. It is Plaintiff's position that testimony from Defendant's 30(b)(6) representative is  
6 necessary to include in her opposition. That deposition occurred on May 22, 2018, the transcript  
7 from that deposition will most likely not be available until at least June 8, 2018.  
8

9 **PROPOSED NEW DEADLINE FOR PLAINTIFF'S OPPOSITION**

10 Plaintiff's Opposition to Defendant's Motion for Protective Order

11 Currently: June 1, 2018

12 Proposed: June 15, 2018

13 Hearing on Defendant's Motion for Protective Order

14 Currently: June 14, 2018 – 10:30 a.m.

15 Proposed: June 27, 2018

16 If this extension is granted, the hearing currently scheduled for June 14, 2018, at 10:30  
17 a.m. regarding the oral arguments on this motion should be rescheduled to allow Defendants time  
18 to reply to Plaintiff's opposition.  
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1           The parties aver that this request for extension of time for Plaintiff's opposition to  
2 Defendants' Motion for Protective Order is made in good faith and not for the purpose of delay.

3           Dated this 29th day of May, 2018.

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6           Dated this 29th day of May, 2018.

7           \_\_\_\_\_  
8           /s/ *Christopher S. Mishler*  
9           ANTHONY P. SGRO, ESQ.  
10          Nevada Bar No. 3811  
11          EUNICE M. BEATTIE, ESQ.  
12          Nevada Bar No. 10382  
13          CHRISTOPHER S. MISHLER, ESQ.  
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22          *Attorneys for Plaintiff*

23          \_\_\_\_\_  
24          /s/ *Ryan Kerbow*  
25          ROBERT K. PHILLIPS, ESQ.  
26          Nevada Bar No. 11441  
27          RYAN KERBOW  
28          Nevada Bar No. 11403  
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33          rphillips@psalaw.net  
34          rkerbow@psalaw.net  
35          *Attorneys for Defendants*

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38          ***IT IS SO ORDERED***

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